

K&L|GATES

March 14, 2011

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**Via ECF Filing**

Magistrate Judge Lois Bloom  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: Padilla v. Bank of America, N.A., Inc. et al., Case No.: CV 11-0709 (KAM) (LB)

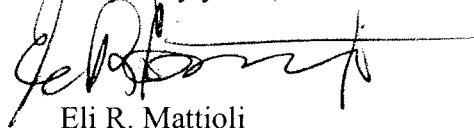
Dear Judge Bloom:

I represent the defendants Universal American Mortgage Company, LLC, Universal American Mortgage Company of California, and Lennar Homes, Inc. in the above-referenced litigation. On behalf of my clients, I respectfully request a thirty (30) day adjournment of the deadline to serve our response to the summons and complaint currently set for March 16, 2011. This is the first instance in which an adjournment is being sought by either party in this case.

Defendants' counsel first received the summons and complaint four days ago on March 10, 2011 and thus has not had sufficient time to prepare a suitable response to the plethora of allegations and causes of action propounded in plaintiff's 47 page pleading. In the intervening time, I have made several attempts to reach plaintiff's counsel to confer on an extension, however I have received no response. As a result, it has now become necessary to request the Court's assistance with this matter.

Plaintiff will not be prejudiced by an adjournment of the deadline. Indeed, a review of the docket for this action reveals that less than one week ago, on March 8, 2011, plaintiff agreed to extend our co-defendants' deadline to respond to the complaint until April 5, 2011.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Eli R. Mattioli', with a long horizontal flourish extending to the right.

Eli R. Mattioli

cc: David A. Bellon, Esq.